

EXHIBIT G

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF MANUELA PICHARDO

I, Manuela Pichardo, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. At the time of these terrorist attacks, I was a citizen of the Dominican Republic. I later became a United States Citizen in 2003. Attached as Exhibit A to this Declaration are true and correct copies of my current proof of U.S. citizenship.

3. On September 11, 2001, I worked as a maintenance employee with American Building Maintenance (ABM) at the World Trade Center (WTC) property. I had been employed with ABM for only a few weeks at the time of the 9/11 attacks. Attached as Exhibit B to this Declaration is a true and correct copy of my proof of employment and my proof of presence at the WTC at the time of the 9/11 terrorist attacks.

4. On the morning of September 11th, I had been cleaning windows on the 81st Floor of the South Tower. As I looked out of one of the windows, I saw a fast-moving object flash by the building

and then I heard a huge explosion. To my horror, I then saw a large hole in the side of the WTC's North Tower with smoke billowing from the area. I began to panic and worry that I might be in extreme danger.

5. My coworker grabbed me by the arm and immediately led me to the elevator so that we could leave the building. As I approached the elevator I warned everyone around us that there was a fire in the North Tower.

6. I took the elevator down to the 78th floor, where I encountered a security guard who attempted to turn me back upstairs as I approached the exit stairwell. I refused to comply with the security guard's request, and I proceeded to enter the stairwell in an effort to escape from the South Tower.

7. As I approached each stairwell landing while descending from the 78th Floor, an ever-increasing number of people also entered the stairwell. Due to the crowd of panicked people entering the stairwell, I had difficulty walking down the steps. When I approached the 40th Floor, I felt the building shake and I saw the walls of the stairwell begin to crack! I screamed in fear, and people began jumping over one another in an effort to escape from the stairwell. I could hear the building cracking and glass exploding, and my ears began to ring from the deafening explosions. It sounded like bombs were exploding in the stairwell.

8. As people jumped over me to escape from the stairwell, I fell backwards and my head and lower back slammed against the concrete steps. People trampled over me and caused injury to my left foot as well. Despite my injuries, I pulled myself up and I continued to stumble down the stairs. I fell in the stairwell several more times, and I injured my back and my knees when I fell to the concrete floor.

9. After I had descended down the stairs for an hour and a half, I finally reached the lobby area of the South Tower. The scene in the lobby was like a war zone. I saw injured people everywhere and everyone was crying and screaming. Outside of the lobby doors, I could hear heavy objects slamming into the ground.

10. I was determined to escape from the building, so I ran outside to the street level in front of the South Tower. As I escaped from the South Tower, the building began to collapse. I attempted to flee from the carnage, but I was swallowed by a massive cloud of smoke, chemicals, and building debris. Some of the falling debris slammed into me and slammed me into the concrete. The area around me became pitch black, and I again struggled to my feet. Due to the thickness of the smoke and the debris cloud, I had trouble breathing and I inhaled large quantities of these substances into my lungs and air passages. I removed my work shirt and I placed it tightly around my face so that I could breath.

11. In the darkness, I walked away from the area with my face covered until I saw daylight near the Staten Island ferry. As I looked behind me at the remains of the South Tower, the area had been covered in a layer of white dust that looked like snow.

12. Police officers directed me to a nearby subway station, but when I arrived, the station had been filled to capacity with people trying to escape from the area. I decided to leave the area on foot and I crossed over the Williamsburg Bridge with another survivor named Kayla. We walked to Kayla's apartment in Williamsburg, and due to my injuries and my extreme anxiety and shock from the events I had witnessed, I was unable to call my family members as I could not remember any of the phone numbers. I then found my brother's phone number in my knapsack, and I called him to come pick me up. I spent the night at my brother's house as all of the roadways and bridges were closed due to the events of 9/11.

13. Shortly after the events of 9/11, I sought medical treatment for my various injuries. As a result of the terrorist attacks, I suffered the following injuries¹ on September 11, 2001: blunt head trauma with a cerebral concussion and post-concussion syndrome with cognitive dysfunction², cervical and

¹ See, 9/11 Injury Records of Manuela Pichardo (PICHARDO_MEDS_0001), attached hereto as Exhibit C, at 0001-0033.

² *Id.* at 0004-0005, 0007, 0009, 0010, 0015, 0017, 0019, 0020-0022, 0024, and 0029.

lumbar injuries to my neck and back³, and an injury to my left foot⁴. Further, due to the horrific events that I experienced on 9/11, my doctors diagnosed me with depression and post-traumatic stress disorder⁵.

14. Attached as Exhibit C to this Declaration is a true and correct copy of my select relevant records confirming my physical and emotional injuries following the September 11, 2001, terrorist attacks.

³ *Id.* at 0001-0002, 0004-0005, 0007, 0009-0010, 0014-0015, 0017, 0019-0022, 0024-0025, and 0027-0030.

⁴ *Id.* at 0007, 0009-0010, 0015, 0017, 0019-0022, 0024-0025, 0027-0028, and 0030.

⁵ *Id.* at 0009, 0011, 0015, 0017, 0019-0022, 0024, 0027-0028, and 0032-0033.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 16 day of November 2023.

A handwritten signature in black ink, appearing to read 'Manuela Pichardo', written over a horizontal line.

Declarant Manuela Pichardo

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**